

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:

**VELSICOL CHEMICAL LLC, et al.,

Debtors.**

CHAPTER 11

**CASE NO. 23-15444
(Jointly Administered)**

Hon. David D. Cleary

**PHARMACIA, LLC'S RESPONSE TO MOTION OF THE DISTRICT OF COLUMBIA
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2004
FOR ORDER AUTHORIZING DISCOVERY RELATING TO DEBTORS AND
RELATED ENTITIES AND INDIVIDUALS**

Pharmacia, LLC ("Pharmacia"), a creditor and party in interest, hereby responds to the *Motion of the District of Columbia Pursuant to Federal Rule of Bankruptcy Procedure 2004 for Order Authorizing Discovery Relating to Debtors and Related Entities and Individuals* [Docket No. 103] (the "2004 Exam Motion") and respectfully requests, to the extent the Court authorizes Rule 2004 discovery against the Debtors or related entities or individuals at this time, that Pharmacia be authorized to appear, ask questions, and request documents in connection with the examination of the Debtors' witnesses to avoid duplication of effort and limit the possibility that the same witnesses may be required to appear for similar examinations more than once in these cases.

WHEREFORE, Pharmacia respectfully requests that any order authorizing a Rule 2004 examination of the Debtors or related entities or individuals at this time also authorize Pharmacia, LLC to appear, ask questions, and request documents in connection with the examination of the Debtors' witnesses; and for such other and further relief as the Court deems just and proper.

Respectfully submitted this 19th day of December, 2023.

JONES & WALDEN LLC

/s/ Eric J Breithaupt

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CERTIFICATE OF SERVICE

This is to certify that on the date indicated below, the foregoing *Pharmacia, LLC's Response To Motion Of The District Of Columbia Pursuant To Federal Rule Of Bankruptcy Procedure 2004 For Order Authorizing Discovery Relating To Debtors And Related Entities And Individuals* ("Response") was electronically entered using the Bankruptcy Court's Electronic Case Filing program which sends a notice of and an accompanying link to the Response to all parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program.

This 19th day of December, 2023.

JONES & WALDEN LLC

/s/ Eric J Breithaupt

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